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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

United States of America,

Plaintiff,

vs.

STEPHEN SILVERMAN,

Defendant.

Case No.: 18-cr-00533-RS

Declaration of Counsel in Support of  
Unopposed Motion for Temporary  
Modification of Defendant Stephen  
Silverman's Conditions of Release to  
Permit Travel and Release of Passport

1 I, Marcus S. Bourassa, declare under penalty of perjury as follows:

- 2 1. I am counsel for defendant Stephen Silverman in this matter.
- 3 2. I make this declaration in support of Mr. Silverman's unopposed motion  
4 for temporary modification of his conditions of release to permit travel  
5 and release of passport.
- 6 3. This declaration is based on my personal knowledge and I could and  
7 would testify to the following facts if called as a witness in this matter.
- 8 4. Defendant Stephen Silverman is on pretrial release in this case on a  
9 \$350,000 bond.
- 10 5. Mr. Silverman has surrendered his passport to Pretrial Services and his  
11 conditions of release prevent him from traveling internationally.
- 12 6. The Court previously approved travel to Holbox Island, Quintana Roo,  
13 Mexico for a family vacation from September 20 to 30, 2020.
- 14 7. Mr. Silverman now hopes to travel so he may be in Zurich, Switzerland,  
15 for work from November 22 to December 1, 2020.
- 16 8. Mr. Silverman further hopes to travel to Dominican Republic for a family  
17 vacation from December 26, 2020 to January 9, 2021.
- 18 9. For this reason, Mr. Silverman requests a temporary modification of his  
19 conditions of release to permit international travel to Switzerland and  
20 Dominican Republic as set forth above.
- 21 10. Mr. Silverman further requests that his passport be temporarily returned  
22 to him as part of the travel.
- 23 11. Mr. Silverman's supervising Pretrial Services Officer, Joslyn Harris, does  
24 not object to these requests and has advised that Mr. Silverman has been  
25 fully compliant with his conditions of release to date.
- 26 12. Mr. Silverman will check in with Ms. Harris prior to his departure, upon  
27 arrival abroad, and immediately upon his return to the United States.
- 28

1 13.Mr. Silverman will also surrender his passport to Pretrial Services upon  
2 his return to the United States.

3 14.Surety Emma Murmuridis agrees to the requested modification as  
4 detailed in the acknowledgment of sureties, attached.

5 15.I have conferred with AUSA Andrew Dawson regarding this motion, and  
6 the United States does not oppose Mr. Silverman's requests.

7  
8 I declare the foregoing to be true and correct under penalty of perjury of the  
9 laws of the United States, this 10th day of November, 2020, in San Diego,  
10 California.

11  
12 *s/ Marcus S. Bourassa*

13 **MARCUS S. BOURASSA**

14 Attorney for Stephen Silverman  
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